

**UNITED STATES DISTRICT COURT
DISTRICT OF NORTH DAKOTA**

Jessica Allen, individually and on behalf of
the heirs at Law of Lacey Higdem,

Plaintiff,

VS.

Myles Brunelle, in his individual capacity;
April Azure, in her individual capacity;
Rolette County; Roy Cordy, MD; and
Presentation Medical Center,

Defendants.

Civil No. 3:22-CV-93 (PDW/ARS)

PLAINTIFF'S MOTION TO UNSEAL DOCUMENTS

Plaintiff Jessica Allen, individually and on behalf of the heirs at law of Lacey Higdem, hereby moves the Court to unseal the following documents pursuant to Federal Rule of Civil Procedure 26(c) and the Scheduling Order, *see* Dkt. 32.

1. A true and correct copy of video file **1797**, *see* Exhibit 27 to the Declaration of Andrew J. Noel, Dkt. 111-27;
2. A true and correct copy of video file **2117**, *see* Exhibit 28 to the Declaration of Andrew J. Noel, Dkt. 111-28;
3. A true and correct copy of video file **1621**, *see* Exhibit 29 to the Declaration of Andrew J. Noel, Dkt. 111-29;
4. A true and correct copy of video file **2206**, *see* Exhibit 30 to the Declaration of Andrew J. Noel, Dkt. 111-30;
5. A true and correct copy of video file **2168**, *see* Exhibit 31 to the Declaration of Andrew J. Noel, Dkt. 111-31;

6. A true and correct copy of video file **2196** and accompanying clips, *see* Exhibit 32 to the Declaration of Andrew J. Noel, Dkt. 111-32;
7. A true and correct copy of video file **1857**, *see* Exhibit 33 to the Declaration of Andrew J. Noel, Dkt. 111-33;
8. A true and correct copy of video file **2233** and accompanying clip, *see* Exhibit 34 to the Declaration of Andrew J. Noel, Dkt. 111-34;
9. A true and correct copy of video file **1187**, *see* Exhibit 35 to the Declaration of Andrew J. Noel, Dkt. 111-35;
10. A true and correct copy of video file **2212** and accompanying clips, *see* Exhibit 36 to the Declaration of Andrew J. Noel, Dkt. 111-36;
11. A true and correct copy of video file **2258**, *see* Exhibit 37 to the Declaration of Andrew J. Noel, Dkt. 111-37;
12. A true and correct copy of video file **2216** and accompanying clips, *see* Exhibit 38 to the Declaration of Andrew J. Noel, Dkt. 111-38;
13. A true and correct copy of video file **2215**, *see* Exhibit 39 to the Declaration of Andrew J. Noel, Dkt. 111-39;
14. A true and correct copy of video file **2154** and accompanying clips, *see* Exhibit 40 to the Declaration of Andrew J. Noel, Dkt. 111-40;
15. A true and correct copy of video file **2048** and accompanying clip, *see* Exhibit 41 to the Declaration of Andrew J. Noel, Dkt. 111-41;
16. A true and correct copy of video file **2199** and accompanying clips, *see* Exhibit 42 to the Declaration of Andrew J. Noel, Dkt. 111-42;

17. A true and correct copy of video file **2188** and accompanying clip, *see* Exhibit 43 to the Declaration of Andrew J. Noel, Dkt. 111-43;
18. A true and correct copy of video file **2202**, *see* Exhibit 44 to the Declaration of Andrew J. Noel, Dkt. 111-44;
19. A true and correct copy of video file **2176**, *see* Exhibit 45 to the Declaration of Andrew J. Noel, Dkt. 111-45;
20. A true and correct copy of video file **1687**, *see* Exhibit 46 to the Declaration of Andrew J. Noel, Dkt. 111-46;
21. A true and correct copy of video file **1976**, *see* Exhibit 47 to the Declaration of Andrew J. Noel, Dkt. 111-47; and
22. A true and correct copy of video file **2282**, *see* Exhibit 48 to the Declaration of Andrew J. Noel, Dkt. 111-48.

Plaintiff's motion is based upon the accompanying Memorandum of Law and all the files, records and proceedings herein.

Respectfully submitted,

Dated: February 11, 2025

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